## Genova vs. City of Harvey 12 CV 3105

Deposition of: Eric Kellogg

Taken on: July 31, 2014

## JENSEN LITIGATION SOLUTIONS

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Page 1

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1
     STATE OF ILLINOIS
                          )SS.
 2
     COUNTY OF COOK
                IN THE UNITED STATES DISTRICT COURT
 3
               FOR THE NORTHERN DISTRICT OF ILLINOIS
 4
                          EASTERN DIVISION
 5
     JEROME P. GENOVA,
 6
                       Plaintiff,
 7
                                       No. 12 CV 3105
               vs.
 8
     ERIC KELLOGG; JOSEPH LETKE;
 9
     LETKE & ASSOCIATES, INC.,
     and the CITY OF HARVEY
10
                       Defendants.
11
12
13
                The deposition of ERIC KELLOGG, called by the
     Plaintiff for examination, taken pursuant to notice and
14
     pursuant to the Federal Rules of Civil Procedure for the
15
16
     United States District Courts pertaining to the taking
17
     of depositions, taken before Jori Gardner, Certified
18
     Shorthand Reporter, at 30 South Wacker Drive, Suite
19
     2200, Chicago, Illinois, commencing at 10:19 a.m. on
20
     July 31st, 2014.
21
22
23
24
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				rages 2
1	APPEARANCES:	Page 2	18	Page 4
2	WALSH LAW GROUP, P.C.		1	INDEXPAGE
	MR. PATRICK J. WALSH			(Continued.)
3	30 South Wacker Drive		2	
	Suite 2200		3	REDACTED ANSWERS
4	Chicago, Illinois 60606		4	Page Line
	Phone: (312) 466-7683		5	Okay. You reside in 7 20
5	E-Mail: pw@thewalshlawgroup.com			Harvey?
6	On behalf of the Plaintiff;		6	Mise cas day
7	Action of the second se			Okay. Just just so I'm 10 20
,	SMITHAMUNDSEN, LLC		7	clear, I mean, to me, staying
8	MR. STEPFON R. SMITH			at a hotel once in a while is
0	150 North Michigan Avenue		8	not regularly. I mean do you
	Suite 3300			stay at another address once
9	Chicago, Illinois 60601		9	or twice a week or more?
	Phone: (312) 894-3395		10	Do you stay at any other address 10 23
10	E-Mail: ssmith@salawus.com			say one or two nights a week or
11	On behalf of the Defendants.		11	more than that?
12			12	
13			13	
14			14	
15			15	
16			16	
17			17	
18			18	
19			19	
20			20	
21			21	
22			Pastral V	
23			22	
24			23	
			24	
1	INDEX	Page 3		Page 5
2	WITNESS	PAGE	1	(Witness sworn.)
3	ERIC KELLOGG	21102	2	WHEREUPON:
4	Examination by Mr. Walsh	5	3	ERIC KELLOGG,
5	Examination by Mr. Smith	168	150	200 CE   100
6	Further examination by Mr. Walsh	175	4	called as a witness herein, having been first duly
7	EXHIBITS		5	sworn, was examined and testified as follows:
8			6	EXAMINATION
	KELLOGG DEPOSITION EXHIBIT	PAGE	7	BY MR. WALSH:
9				
	No. 1	24	8	Q. Could you state your full name and spell your
10	No. 2	24	9	last name for the record.
11	No. 4	25 42	10	A. Eric J. Kellogg, ERIC, KELLOGG.
	No. 5	54	11	
12			1 1 1	
	No. 6	63		Q. And you are the mayor of Harvey, correct?
	No. 7	63 77	12	A. Correct.
13	No. 7 No. 8	77 98		
	No. 7 No. 8 No. 9	77 98 145	12 13	A. Correct. Q. Okay. Have you given a deposition before
13 14	No. 7 No. 8 No. 9 No. 10	77 98 145 147	12 13 14	A. Correct. Q. Okay. Have you given a deposition before today?
	No. 7 No. 8 No. 9	77 98 145 147 150	12 13	A. Correct. Q. Okay. Have you given a deposition before
14	No. 7 No. 8 No. 9 No. 10 No. 11	77 98 145 147	12 13 14	A. Correct. Q. Okay. Have you given a deposition before today?
14	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12	77 98 145 147 150	12 13 14 15 16	A. Correct. Q. Okay. Have you given a deposition before today? A. I gave several. Q. Several.
14 15 16	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13	77 98 145 147 150 158	12 13 14 15 16 17	A. Correct. Q. Okay. Have you given a deposition before today? A. I gave several. Q. Several. Okay. When's the last time?
14 15	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15	77 98 145 147 150 158 159	12 13 14 15 16	A. Correct. Q. Okay. Have you given a deposition before today? A. I gave several. Q. Several.
14 15 16 17	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14	77 98 145 147 150 158 159	12 13 14 15 16 17	A. Correct. Q. Okay. Have you given a deposition before today? A. I gave several. Q. Several. Okay. When's the last time?
14 15 16 17	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15  (Exhibits retained by Mr. Walsh.)	77 98 145 147 150 158 159	12 13 14 15 16 17 18	A. Correct. Q. Okay. Have you given a deposition before today?  A. I gave several. Q. Several. Okay. When's the last time? A. I can't recall the exact date. Q. Within the last year?
14 15 16 17	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15  (Exhibits retained by Mr. Walsh.)	77 98 145 147 150 158 159 159	12 13 14 15 16 17 18 19 20	A. Correct. Q. Okay. Have you given a deposition before today?  A. I gave several. Q. Several. Okay. When's the last time?  A. I can't recall the exact date. Q. Within the last year? A. I can't recall.
14 15 16 17 18	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15  (Exhibits retained by Mr. Walsh.)	77 98 145 147 150 158 159 160	12 13 14 15 16 17 18 19 20 21	A. Correct. Q. Okay. Have you given a deposition before today?  A. I gave several. Q. Several. Okay. When's the last time? A. I can't recall the exact date. Q. Within the last year?
14 15 16 17 18 19 20	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15  (Exhibits retained by Mr. Walsh.)  C E R T I F I E D Q U E S T I O N S PAGE	77 98 145 147 150 158 159 160	12 13 14 15 16 17 18 19 20	A. Correct. Q. Okay. Have you given a deposition before today?  A. I gave several. Q. Several. Okay. When's the last time?  A. I can't recall the exact date. Q. Within the last year? A. I can't recall.
14 15 16 17 18 19 20 21	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15  (Exhibits retained by Mr. Walsh.)  C E R T I F I E D Q U E S T I O N S PAC  Do you have 1:	77 98 145 147 150 158 159 160	12 13 14 15 16 17 18 19 20 21	A. Correct. Q. Okay. Have you given a deposition before today?  A. I gave several. Q. Several. Okay. When's the last time? A. I can't recall the exact date. Q. Within the last year? A. I can't recall. Q. Okay. Do you know if it was within two years? A. I can't recall.
14 15 16 17 18 19 20 21	No. 7 No. 8 No. 9 No. 10 No. 11 No. 12 No. 13 No. 14 No. 15  (Exhibits retained by Mr. Walsh.)  C E R T I F I E D Q U E S T I O N S PAC  Do you have 1:	77 98 145 147 150 158 159 160	12 13 14 15 16 17 18 19 20 21 22	A. Correct. Q. Okay. Have you given a deposition before today?  A. I gave several. Q. Several. Okay. When's the last time? A. I can't recall the exact date. Q. Within the last year? A. I can't recall. Q. Okay. Do you know if it was within two years? A. I can't recall.





Pages 6..9

Page 8 Page 6 officers, we try to keep that off the record. rather than a nod of the head so the court reporter can 1 2 2 take everything down. Thank you. A. 3 A. Uh-huh. 3 MR. WALSH: So, I don't know if you can -- we can 4 0. If you don't understand the question that I 4 do that, put it under seal or something. 5 ask, just say so and I'll repeat it or rephrase it or 5 We don't want your personal address. 6 slow down or whatever I need to do to ensure that you 6 BY MR. WALSH: 7 understand it. 7 Have you ever lived anywhere outside of 8 8 It's important that we speak one at a time; in Harvey? I know you -- be specific, a town rather than a conversation a lot of times people talk over one 9 specific address. 9 another, but, again, just so the court reporter can take 10 10 A. When I was in college. 11 everything down, we need to give each other a chance. 11 Okay. In what town? Q. If you need a break, you can take a break as long as 12 Bloomington, Illinois. 12 A. 13 there's not a question pending. 13 Q. Did you go to ISU? 14 A. Okay. 14 A. Yes, sir. 15 Are you under any medications today that would 15 0. Did you -- I'm sorry to ask these questions, 16 make it difficult for you to understand or answer 16 because I understand that your mother has passed away at questions? 17 17 some point, but did you used to live with your mother? 18 A. A. Yes. No, sir. 18 19 Q. Okay. Have you had any alcoholic beverages 19 Q. Okay. For how long? 20 within the last 24 hours? 20 A. I don't know exact, you know, time. It was --21 No. sir. 21 I don't know exact time. A. 22 Was it more than a year? Q. Okay. What's your date of birth? 22 Q. 23 23 A. 56. A. Yes. 24 When were you first elected mayor of Harvey? 24 Q. Okay. More than five years? Page 7 Page 9 1 A. April 2003. Could have been. 1 A. 2 And how many times have you been elected Okay. Do you still live in the house that you Q. 2 Q. 3 mayor? lived at with your mother? 4 A. Three so far. 4 No, I reside at another house. 5 And are you running in 2015? 5 Okay. Are you registered to vote from your Q. Q. 6 A. Yes. 6 mother's house? 7 I was registered at 1 7 Q. Have you ever lost a mayor election? -- yes. 8 A. Yes. 8 Okay. And does your driver's license have an 9 9 address on it of a property that's owned by your Q. In what year? 10 A. 199. 10 brother, Derrick? Q. 11 And who did you run against in 1999? 11 A. Yes. 12 A. Mayor Nick Graves. 12 Q. Okay. And is that the address in which you 13 0. Does Harvey have a residency requirement for 13 currently live? 14 its mayor? 14 Yes. A. 15 15 A. Not that I'm aware of. 0. Okay. Do you live with your brother? 16 So you're unaware whether the mayor is 16 A. 17 required to live within the city limits? 17 Did you ever stay at any other address other I've always been a resident of Harvey. than the one that's on your driver's license? 18 18 Okay. You reside in Harvey? 19 Q. 19 MR. SMITH: Object to the form of the question. 20 A. 20 If you understand the question, you can answer You know what, just so -- we don't -- you 21 it in terms of where you stay. Do you understand that? 21 22 don't have to put your exact address on the record and 22 THE WITNESS: Yes. 23 if we can put that under seal. 23 BY THE WITNESS: 24 With the political officials and police 24 The address at -- well, at my mother's

	Page 10		Page 12
1	address.	1	A. No, divorced.
2	Q. Okay. Do you currently live alone?	2	Q. Okay. And what year were you divorced?
3	A. Let me ask let me let me rephrase that	3	A. I'm not sure exact date, maybe '85, somewhere
4	now. When you say have I lived at any other address	4	around there.
5	Q. Uh-huh.	5	Q. Okay. Does your former spouse work at the
6	A okay, what what do you mean have I	6	City of Harvey?
7	because do I visit other other addresses or	7	A. No.
8	Q. Yeah, do you regularly stay at any address	8	Q. Okay. Has she ever worked at the City of
9	other than the one that's on your driver's license?	9	Harvey?
10	MR. SMITH: When you say stay, what exactly do you	10	A. No.
11	mean?	11	Q. Okay. Do you have any children?
12	BY MR. WALSH:	12	A. Eric J. Kellogg, II.
13	Q. Spend the night.	13	Q. Is that your only biological child?
14	A. Like a it could be a hotel or a I	14	A. Eric J. Kellogg, II.
		15	Q. Yes, that's your only biological child?
15	mean	16	
16	Q. Okay. Just just so I'm clear, I mean, to	16	
17	me, staying at a hotel once in a while is not regularly.		-
18	I mean do you stay at another address once or twice a	18	A. In terms of my son is Eric J. Kellogg, II.
19	week or more?	19	Q. Okay. But
20	A.	20	A. You just asked me
21	Q. Do you stay at any other address say one or	21	Q. I asked you do you have any children other
22	two nights a week or more than that?	22	than Eric J. Kellogg, II.
23	Α.	23	A. Eric J. Kellogg, II, is my the only child
24		24	that I have.
	Dana 44	-	
	Page 11		Page 13
1	Q. I understand. I'm asking where you would	1	Q. Okay.
1 2	AND TOUR OF THE PROPERTY OF TH	1 2	Q. Okay.  A. In terms of that's that was on my income
	Q. I understand. I'm asking where you would		Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.
2	Q. I understand. I'm asking where you would stay.	2	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have
2 3	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night	2 3	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the
2 3 4	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night more than one or two nights a week?  A. I mean, what what difference I mean, I don't really understand the context of the question.	2 3 4	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the characterization on your tax return documents, do you
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2 3 4 5 6 7 8 9 10 11 12 13	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night more than one or two nights a week?  A. I mean, what what difference I mean, I don't really understand the context of the question.  MR. SMITH: I'm going to object to relevance as there is nothing in the pleadings that have anything to do with the mayor's residence.  I'm not going to instruct the mayor not to answer the question, but  BY MR. WALSH:  Q. That's fine. We'll move on.	2 3 4 5 6 7 8 9 10 11 12 13	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the characterization on your tax return documents, do you have any other biological children?  MR. SMITH: That you know of.  BY THE WITNESS:  A. Eric J. Kellogg, II.  Q. Is what?  A. Is my son.  Q. Okay. Are you are you not answering the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night more than one or two nights a week?  A. I mean, what what difference I mean, I don't really understand the context of the question.  MR. SMITH: I'm going to object to relevance as there is nothing in the pleadings that have anything to do with the mayor's residence.  I'm not going to instruct the mayor not to answer the question, but BY MR. WALSH:  Q. That's fine. We'll move on.  A. All right.  Q. Okay. I'm sorry, did you say you live alone currently?  A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the characterization on your tax return documents, do you have any other biological children?  MR. SMITH: That you know of.  BY THE WITNESS:  A. Eric J. Kellogg, II.  Q. Is what?  A. Is my son.  Q. Okay. Are you are you not answering the I mean  A. No, I'm answering. You just asked me do I have any biological kids, I said Eric J. Kellogg.  Q. I said the question is do you have any
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night more than one or two nights a week?  A. I mean, what what difference I mean, I don't really understand the context of the question.  MR. SMITH: I'm going to object to relevance as there is nothing in the pleadings that have anything to do with the mayor's residence.  I'm not going to instruct the mayor not to answer the question, but BY MR. WALSH:  Q. That's fine. We'll move on.  A. All right.  Q. Okay. I'm sorry, did you say you live alone currently?  A. Yes.  Q. Okay. Other than your mother, did you ever live with anybody else in your adult life?  A. Yeah, when I was married.  Q. Okay. And when were you married?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the characterization on your tax return documents, do you have any other biological children?  MR. SMITH: That you know of.  BY THE WITNESS:  A. Eric J. Kellogg, II.  Q. Is what?  A. Is my son.  Q. Okay. Are you are you not answering the I mean  A. No, I'm answering. You just asked me do I have any biological kids, I said Eric J. Kellogg.  Q. I said the question is do you have any biological children other than Eric J. Kellogg?  A. Again, I'm telling you, the biological son that I have is Eric J. Kellogg.  Q. The only one?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night more than one or two nights a week?  A. I mean, what what difference I mean, I don't really understand the context of the question.  MR. SMITH: I'm going to object to relevance as there is nothing in the pleadings that have anything to do with the mayor's residence.  I'm not going to instruct the mayor not to answer the question, but BY MR. WALSH:  Q. That's fine. We'll move on.  A. All right.  Q. Okay. I'm sorry, did you say you live alone currently?  A. Yes.  Q. Okay. Other than your mother, did you ever live with anybody else in your adult life?  A. Yeah, when I was married.  Q. Okay. And when were you married?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the characterization on your tax return documents, do you have any other biological children?  MR. SMITH: That you know of.  BY THE WITNESS:  A. Eric J. Kellogg, II.  Q. Is what?  A. Is my son.  Q. Okay. Are you are you not answering the I mean  A. No, I'm answering. You just asked me do I have any biological kids, I said Eric J. Kellogg.  Q. I said the question is do you have any biological children other than Eric J. Kellogg?  A. Again, I'm telling you, the biological son that I have is Eric J. Kellogg.  Q. The only one?  A. Only one son, Eric J. Kellogg.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. I understand. I'm asking where you would stay.  Do you stay anywhere else; spend the night more than one or two nights a week?  A. I mean, what what difference I mean, I don't really understand the context of the question.  MR. SMITH: I'm going to object to relevance as there is nothing in the pleadings that have anything to do with the mayor's residence.  I'm not going to instruct the mayor not to answer the question, but BY MR. WALSH:  Q. That's fine. We'll move on.  A. All right.  Q. Okay. I'm sorry, did you say you live alone currently?  A. Yes.  Q. Okay. Other than your mother, did you ever live with anybody else in your adult life?  A. Yeah, when I was married.  Q. Okay. And when were you married?  A. I don't know exact year, 1980, somewhere	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay.  A. In terms of that's that was on my income tax and the one that I supported.  Q. Well, I'm asking if you've ever do you have any other biological children regardless of their the characterization on your tax return documents, do you have any other biological children?  MR. SMITH: That you know of.  BY THE WITNESS:  A. Eric J. Kellogg, II.  Q. Is what?  A. Is my son.  Q. Okay. Are you are you not answering the I mean  A. No, I'm answering. You just asked me do I have any biological kids, I said Eric J. Kellogg.  Q. I said the question is do you have any biological children other than Eric J. Kellogg?  A. Again, I'm telling you, the biological son that I have is Eric J. Kellogg.  Q. The only one?  A. Only one son, Eric J. Kellogg.

1	Page 14 that I have is Eric J. Kellogg.	1	Page 16 A. Yes.
2	MR. WALSH: Okay. Just so I'm going to certify	2	Q. Okay. And what year did you get the
3	this just for the sake of not going over it again and	3	superintendent endorsement?
4	again.	4	A. I would say from 2002, somewhere around there.
5	BY MR. WALSH:	5	Q. Okay. And as the superintendent or to your
6	Q. Can you tell me your educational background	6	knowledge, is the superintendent endorsement required to
7	starting with high school.	7	be a superintendent of a school district?
8	A. High school diploma.	8	A. Yes.
9	Q. From where?	9	Q. Is the administrative certificate also a
10	A. Thornton High School.	10	requirement?
11	Q. Thornton?	11	A. Yes.
12	A. Thornton, yes.	12	Q. Can you tell me about employment history after
13	Q. Okay. And in what year did you graduate?	13	college.
14	A. '74. 1974.	14	A. I was employed in School District 147 for
15	Q. And do you have education after high school?	15	20 years as a teacher, a dean and a coach.
16	A. Graduated from Illinois State University.	16	Q. Was that in
17	Q. Okay.	17	A. School District 147.
18	A. December 1979.	18	Q. Starting what year?
19	Q. Uh-huh.	19	A. I would say '81, '82, somewhere around there,
20	A. Graduated from then I have a teaching	20	yeah.
21	certificate from DePaul University.	21	Q. And was it at more than one school?
22	Q. Uh-huh.	22	A. It was Rosa Parks Middle School and Dr. Martin
23	A. I have	23	Luther King Elementary School.
24	Q. What year did you get the teaching	24	Q. And in what towns are those schools?
		1	
1	Page 15	1	Page 17
1 2	certificate?	1 2	A. School District 147 is in Dixmoor and Harvey.
1 2 3	certificate?  A. I don't recall the exact year, maybe '80, '81.	2	<ul><li>A. School District 147 is in Dixmoor and Harvey.</li><li>Q. And then what did you do after you ended your</li></ul>
2	certificate?	2	A. School District 147 is in Dixmoor and Harvey. Q. And then what did you do after you ended your employment with District 147?
2 3	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis	2 3 4	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think
2 3 4	A. I don't recall the exact year, maybe '80, '81. Q. Okay.	2	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.
2 3 4 5	Certificate?  A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?	2 3 4 5	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm
2 3 4 5 6	A. I don't recall the exact year, maybe '80, '81. Q. Okay. A. I have a master's from National Louis University.	2 3 4 5 6	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?
2 3 4 5 6 7	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?  THE WITNESS: I have a master's in education, I	2 3 4 5 6 7	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?
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2 3 4 5 6 7 8 9	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?  THE WITNESS: I have a master's in education, I believe it was 1985 from National Louis University.  MS COURT REPORTER: Thank you.  BY THE WITNESS:  A. I have a Type 75, which is an administrative	2 3 4 5 6 7 8 9	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?  A. Yes, that's correct.  Q. And then District 152 from 2001 approximately
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?  THE WITNESS: I have a master's in education, I believe it was 1985 from National Louis University.  MS COURT REPORTER: Thank you.  BY THE WITNESS:  A. I have a Type 75, which is an administrative certificate from Louis University in in Romeoville and then I have a superintendent's endorsement from Louis University in Romeoville.  Q. What year did you get the administrative certificate?  A. I would say around 2002ish, threeish,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?  A. Yes, that's correct.  Q. And then District 152 from 2001 approximately until June 30th of 2013?  A. Yes, sir.  Q. Okay. And what positions did you hold in District 152?  A. Director of Administrative Support Service.  Q. Uh-huh.  A. Assistant superintendent and superintendent.  Q. And when were you the Director of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?  THE WITNESS: I have a master's in education, I believe it was 1985 from National Louis University.  MS COURT REPORTER: Thank you.  BY THE WITNESS:  A. I have a Type 75, which is an administrative certificate from Louis University in in Romeoville and then I have a superintendent's endorsement from Louis University in Romeoville.  Q. What year did you get the administrative certificate?  A. I would say around 2002ish, threeish, somewhere around there.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?  A. Yes, that's correct.  Q. And then District 152 from 2001 approximately until June 30th of 2013?  A. Yes, sir.  Q. Okay. And what positions did you hold in District 152?  A. Director of Administrative Support Service.  Q. Uh-huh.  A. Assistant superintendent and superintendent.  Q. And when were you the Director of Administrative I forgot the last part of it.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?  THE WITNESS: I have a master's in education, I believe it was 1985 from National Louis University.  MS COURT REPORTER: Thank you.  BY THE WITNESS:  A. I have a Type 75, which is an administrative certificate from Louis University in in Romeoville and then I have a superintendent's endorsement from Louis University in Romeoville.  Q. What year did you get the administrative certificate?  A. I would say around 2002ish, threeish, somewhere around there.  Q. And what sort of administration did you study there?  A. It was general administration for qualifying me to be a superintendent in an administration and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?  A. Yes, that's correct.  Q. And then District 152 from 2001 approximately until June 30th of 2013?  A. Yes, sir.  Q. Okay. And what positions did you hold in District 152?  A. Director of Administrative Support Service.  Q. Uh-huh.  A. Assistant superintendent and superintendent.  Q. And when were you the Director of Administrative I forgot the last part of it.  A. Director of Administrative Support Services.  Q. Okay.  A. Had to be 2003 or 2004. Yeah, 2003, 2004, somewhere there.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I don't recall the exact year, maybe '80, '81.  Q. Okay.  A. I have a master's from National Louis University.  MS. COURT REPORTER: You have a what?  THE WITNESS: I have a master's in education, I believe it was 1985 from National Louis University.  MS COURT REPORTER: Thank you.  BY THE WITNESS:  A. I have a Type 75, which is an administrative certificate from Louis University in in Romeoville and then I have a superintendent's endorsement from Louis University in Romeoville.  Q. What year did you get the administrative certificate?  A. I would say around 2002ish, threeish, somewhere around there.  Q. And what sort of administration did you study there?  A. It was general administration for qualifying	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. School District 147 is in Dixmoor and Harvey.  Q. And then what did you do after you ended your employment with District 147?  A. I was hired in School District 152 for I think 13, 14 years where I retired last June 30th.  Q. Okay. Just to be or just so that I'm clear, you were in 147 from approximately '81 to 2001?  A. Yes, that's correct.  Q. And then District 152 from 2001 approximately until June 30th of 2013?  A. Yes, sir.  Q. Okay. And what positions did you hold in District 152?  A. Director of Administrative Support Service.  Q. Uh-huh.  A. Assistant superintendent and superintendent.  Q. And when were you the Director of Administrative I forgot the last part of it.  A. Director of Administrative Support Services.  Q. Okay.  A. Had to be 2003 or 2004. Yeah, 2003, 2004,

Page 18 Page 20 I believe I was assistant superintendent, I 1 1 BY MR. WALSH: believe, five, six years, superintendent three years. 2 2 Q. Let me clarify. 3 Okay. So the five to six years, was that 3 A. Okay. 4 approximately 2002 to 2008 or somewhere in that range? 4 Q. And you can correct me if I'm wrong, but in my 5 A. Somewhere in that range. view I guess in this -- in that particular case -- a 6 Okay. And then when you -- were you made -judgment would be where a jury found in Alex Gbur's 7 or were you appointed superintendent in 2008? 7 favor and against you, personally, as mayor; so with 8 No, I was -- I think, it was 2010. 8 that understanding, do you know whether there was a 9 Q. 2010. Okay. 9 judgment entered against you in the Gour case? 10 A. Uh-huh. 10 MR. SMITH: If -- if you know. 11 All right. Have you ever been convicted of a 11 MR. WALSH: Every question is if he knows. 12 felony or misdemeanor involving dishonesty? 12 BY THE WITNESS: 13 No, sir. 13 Again -- again -- again, when you speak in 14 Q. Have you ever been a plaintiff or a defendant 14 specifics, with me, personally, as -- you know, because, in a civil matter other than this one? 15 as you know, I can be sued, you know, personally and I believe as the mayor I have been involved in 16 16 then the city can be sued, so in terms of the city, 17 other civil litigation. 17 it's -- it's public record that they did lose that case. 18 Okay. Have you ever been a plaintiff in civil 18 Okay. My understanding is that official 19 litigation? In other words, have you ever sued anybody? 19 capacity suits against the mayor really can't exist so 20 Not that I recall. 20 that the mayor is always sued individually, because the 21 Q. And how many times have you been a defendant mayor is the same as the city in terms of lawsuits, but 21 22 as mayor? if you don't recall, you don't recall. 23 A. I'm not sure in terms of actual numbers. 23 What is the Kel-Law Foundation? 24 Okay. How many times have you given testimony 24 Oh, that was --Page 19 Page 21 under oath before today? 1 1 MR. WALSH: KEL, LAW. 2 A. Somewhere in the area of five. 2 BY THE WITNESS: 3 And of those five, how many of them were 3 A. A foundation that was founded by 4 depositions? 4 Linda Allen Washington and myself probably about 5 Again, not giving an accurate number, I would 5 20 years ago that's no longer in function. I haven't 6 say three -- three to four, maybe. been apart of that organization probably seven, eight 7 Okay. And were the remaining one or two trial 7 years and it dealt with battered and abused women and testimony? 8 8 children. 9 A. The best of my recollection, I would feel safe 9 Is Linda Allen Washington a relative of yours? 10 to say. 10 A. No, she's not. 11 Q. Have you ever had a judgment entered against 11 Q. Have you ever supported her in a political 12 you in a civil matter? 12 campaign? 13 A. Not that I recall. 13 A. Not that I can recall. 14 How about the Alex Gbur case, did you have a 14 0. She is a trustee in Sauk Village, correct? judgment entered against you in that case? 15 15 Yes, sir, I believe so. When you say against me, personally? 16 A. 16 Did you give her any campaign donations when 17 17 she was running for trustee? 18 You know, I think -- if it's against the City 18 Not that I can recall. A. 19 of Harvey, there was, I believe, a -- Alex Gbur was 19 Do you know whether she's given you any 0. 20 awarded some money, but when you say me, personally, not 20 campaign donations? 21 me, personally. 21 I mean, anyone who gave public donations to me 22 MR. SMITH: I'm going to object to the form of the 22 is public record, I'm not -- I'm not sure. 23 question. 23 Are you a partner or owner of any other --24 Do you know what judgment is, Mayor? Strike that.

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	Page 22	Ī	Page 24
1	I understand the Kel-Law Foundation is perhaps	1	(Kellogg Deposition Exhibit No. 1
2	now	2	marked as requested.)
3	A. Defunct.	3	BY MR. WALSH:
4	Q defunct?	4	Q. Showing you what I have marked as Kellogg 1.
5	A. Right.	5	Do you recognize the document?
6	Q. Are you a partner or owner of any other	6	A. Let me get my glasses.
7		1	
	corporate entity?	7	Yes.
8	A. Not a current owner.	8	Q. Okay. And what do you recognize it to be?
9	Q. Have you been the owner or partner in another	9	A. This is a document that was, I believe it's
10	corporate entity?	10	too vague to really
11	A. If you would want to no, no, no.	11	Q. Okay.
12	Q. No?	12	A. It's just it's just to me, it's just
13	A. No.	13	some legislative votes that was voted on by aldermen.
14	Q. All right. Do you understand that you're	14	Q. Okay. Do you see your signature on the page?
15	testifying today because you're a defendant in a lawsuit	15	A. Yes, I do.
16	filed by Jerry Genova?	16	Q. Okay. Is that your signature?
17	A. Yes, I do.	17	A. Yes, it is.
18			*
		18	Q. And that's an accurate copy of your signature?
19	allegations in the lawsuit?	19	A. Absolutely.
20	A. Yes, I do.	20	Q. Okay. Showing you what I'm going to mark here
21	Q. Okay. Can you tell me what your understanding	21	as Kellogg No. 2.
22	is.	22	(Kellogg Deposition Exhibit No. 2
23	A. There was this lawsuit is basically	23	marked as requested.)
24	involves, you know, Mayor Genova and the City of Harvey	24	994
111111111111111111111111111111111111111			D 05
1	Page 23	100	Page 25
1	through which he indicated that he lost his place of	1	BY MR. WALSH:
2	through which he indicated that he lost his place of employment for political reprisal or something to that	1 2	BY MR. WALSH:  Q. Take a look at the document oh, you know
2 3	through which he indicated that he lost his place of employment for political reprisal or something to that effect.	1 2 3	BY MR. WALSH:  Q. Take a look at the document oh, you know what, I'll take that back. That's fine. We'll keep
2 3 4	through which he indicated that he lost his place of employment for political reprisal or something to that effect.  Q. Have you read the complaint in this case?	1 2 3 4	BY MR. WALSH:  Q. Take a look at the document oh, you know what, I'll take that back. That's fine. We'll keep that as Kellogg Exhibit No. 2.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	through which he indicated that he lost his place of employment for political reprisal or something to that effect.  Q. Have you read the complaint in this case?  A. I don't believe I in totality I don't think I have.  Q. Other than your attorney, have you spoken with anyone about this case?  A. To the best of my recollection, no.  Q. You haven't spoken with Joe Letke about the case?  A. The best of my recollection yeah, best of my recollection I don't recall if I ever had any conversation with Mr. Letke.  Q. So other than your attorney, you don't think you spoke with anybody?  A. To the best of my recollection.  Q. Okay. Did you review any documents to prepare for today?  A. In terms of today, no, I didn't.  Q. Okay.  MR. WALSH: Do you have any stickers?  MS COURT REPORTER: Yeah, I have a stamp.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	PY MR. WALSH:  Q. Take a look at the document oh, you know what, I'll take that back. That's fine. We'll keep that as Kellogg Exhibit No. 2.  Showing you what I'll mark as Kellogg 3.  (Kellogg Deposition Exhibit No. 3 marked as requested.)  BY MR. WALSH:  Q. Do you recognize Exhibit No. 3?  A. Yes, I do. Q. Okay. And what do you recognize it to be? A. Interrogatory. Q. Okay. And did you provide the information that was used to create Exhibit No. 3?  A. Yes. Q. And you see the signature on the last page? A. Yes. Q. Okay. Would you agree that it looks different than the signature in Exhibit 1? A. All my signatures look different. Q. They do? A. Yes. Q. Okay. So is this your signature in the last
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	through which he indicated that he lost his place of employment for political reprisal or something to that effect.  Q. Have you read the complaint in this case?  A. I don't believe I in totality I don't think I have.  Q. Other than your attorney, have you spoken with anyone about this case?  A. To the best of my recollection, no.  Q. You haven't spoken with Joe Letke about the case?  A. The best of my recollection yeah, best of my recollection I don't recall if I ever had any conversation with Mr. Letke.  Q. So other than your attorney, you don't think you spoke with anybody?  A. To the best of my recollection.  Q. Okay. Did you review any documents to prepare for today?  A. In terms of today, no, I didn't.  Q. Okay.  MR. WALSH: Do you have any stickers?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	PY MR. WALSH:  Q. Take a look at the document oh, you know what, I'll take that back. That's fine. We'll keep that as Kellogg Exhibit No. 2.  Showing you what I'll mark as Kellogg 3.  (Kellogg Deposition Exhibit No. 3 marked as requested.)  BY MR. WALSH:  Q. Do you recognize Exhibit No. 3?  A. Yes, I do. Q. Okay. And what do you recognize it to be? A. Interrogatory. Q. Okay. And did you provide the information that was used to create Exhibit No. 3?  A. Yes. Q. And you see the signature on the last page? A. Yes. Q. Okay. Would you agree that it looks different than the signature in Exhibit 1?  A. All my signatures look different. Q. They do? A. Yes.

Pages 26..29

	Page 26		Page 28
1	A. Yes, it is.	1	services.
2	Q. Are you familiar with and don't be insulted	2	Q. Do you work out of City Hall?
3	by the question, I just have get a clear record.	3	A. Some days. Some days I work throughout the
4	Are you familiar with the form of government	4	city.
5	and the function of the government in Harvey between	5	Q. Okay. Do you mean out
6	2008 and 2011?	6	A. In the community.
7	A. Yes, sir.	7	Q. Out in the field
8	Q. Okay. As a mayor and city council?	8	A. Yes, sir.
9	A. Yes, sir.	9	Q so to speak?
10	Q. Is it home rule?	10	A. Uh-huh.
11	A. Yes, sir.	11	Q. Okay. And how many hours do you work per week
12	Q. And was the governmental structure the same	12	as mayor?
13	between 2008 and May of 2010?	13	A. I couldn't put an exact time on it cause from
14	A. Yes.	14	the time I wake up if I'm at the track in the morning
15	Q. Does the City of Harvey have a city manual for	15	jogging and residents are there, then I'm working.
16	employees?	16	
17	A. Yes, I believe so, yes.	17	I'm severing 'til 10:00, 11:00 o'clock so I
18	Q. Okay. And do you know what it's called?		couldn't put an exact you know, I work for the people
19	A. City manual.	18	so I can't really put a time limit on it.
20	Solution of Solution (Solution Solution	19	Q. Do you have any other employment?
21	Q. Okay. And are you required to be familiar with its contents?	20	A. Currently, again, I just retired from the
255,550		21	superintendency.
22	A. Each employee should be familiar with the	22	Q. Okay. Do you have any other employment
23	contents associated with the particular manual.	23	currently?
24	Q. Okay. Are you familiar with the contents?	24	A. Yes, I I'm on staff as a Dixmoor Police
	Page 27		Page 29
1	A. Again, I'll probably peruse it, but I'm I'm	1	part-time police.
2	sure that if I had to see it again, I would I would	2	Q. Okay. And what hours do you work as a
3	be able to recite some things from it.	3	part-time police officer in Dixmoor?
4	Q. Okay. Does Harvey have a policy in that	4	A. Well, again, I'm part-time.
5	manual on political discrimination?	5	Q. Uh-huh.
6	A. I believe so.	6	A. And based it's on you know, on my
7	Q. And do you know what that policy states?	7	schedule with as the mayor, you know, so
8	A. I wouldn't be able to give you a verbatim, but	8	Q. Okay. When's the last time you worked as a
9	I believe that any municipality or organization should	9	part-time police officer in Dixmoor?
10	have a policy relative to discrimination.	10	A. I don't recall the exact date. I don't recall
11	Q. Including political?	11	the exact date.
12	A. Political, sexual, whatever, you know.	12	Q. Was it in July?
13	Q. Okay. I want to talk a little bit about your	13	A. It could have been. I'm not sure of the exact
14	duties as mayor.	14	date.
15	A. Yes.	15	Q. Okay. Are you paid there hourly or salary?
16	Q. Tell me, generally, what are your duties as	16	A. It's it's hourly and it's a minimal I
17	mayor?	17	think it's like \$12 an hour or something like that.
18	A. Well, it's a part-time position.	18	Q. Okay. And do you have to punch in and punch
19	Q. Uh-huh.	19	out?
20	A. My job is to oversee the day-to-day operations	20	A. Yes, sir.
21	of the city.	21	Q. And do you get a police car from Dixmoor?
22	Q. Okay.	22	A. No, sir.
23	A. To work in concert with my department heads to	23	Q. Are you uniformed when you work there?
24	make sure that the residents are being provided city	24	A. Yes, sir.
L			

Pages 30..33

1	Q.	Page 30 And when's the last time you made an arrest in	1	Q.	Page 32 Do you know if Ms. Clark is a democrat or
2	Dixmoor?		2	republica	an?
3	A.	I can't recall.	3	A.	I wouldn't know.
4	Q.	In 2014?	4	Q.	Do you know if she ran on a ticket with anyone
5	A.	I can't recall.	5	else?	
6	Q.	Do you know if in 2013?	6	A.	I wouldn't know. I can't recall. To be
7	A.	I can't recall.	7	honest wi	th you, I can't recall.
8	MR.	SMITH: Object, object. Asked and answered.	8	Q.	Have you ever done political work for
9	He answer	red the question three times.	9	Ms. Clark	s?
10	BY MR. WA		10	A.	I can't recall.
11	Q.	I asked him 2014.	11	MR.	SMITH: Object to the form of the question.
12	Α.	I can't recall.	12	15,500	Political work, what exactly do you mean?
13	Q.	And then I asked you about 2013.	13	MR.	WALSH: Anything to assist her political goals.
14	Α.	I can't recall.	14	BY THE WI	
15	Q.	Okay. Do you ever recall making an arrest in	15	A.	I can't recall if I have.
16	Dixmoor?	only is no you over rooms making on our correction	16	Q.	You don't recall one way or the other?
17	Α.	I can't recall.	17	Α.	No.
18	Q.	When were you appointed a part-time police	18		
19	1.000 miles	n Dixmoor?	0.0000000000000000000000000000000000000	Q. Ms. Clark	Have you ever made a political contribution to
20			19		
100000	A.	Probably when I became a state certified	20	A.	I don't recall ever making a contribution to
21		ficer, right after that. I would say within a	21		x. I don't recall that.
22		robably seven, eight years ago.	22	Q.	You don't recall one way or the other?
23	Q.	Okay.	23	Α.	No.
24	A.	I don't have the exact date, but I'm sure it's	24	Q.	Do you know whether Ms. Clark has made a
-	1.7.5	Page 31			Page 33
1	public re		1		contribution to you or your campaigns?
2	Q.	Do you have any paid employment other than	2	A.	I'm not sure.
3		l part-time police officer in Dixmoor?	3	Q.	And do you know when Ms. Clark was first
4	A.	That's it.	4	elected?	
5	Q.	Do you have any sources of income other than	5	A.	Possibly in 2007 or '08.
6	those two	positions?	6	Q.	Okay.
7	A.	I have my retirement and the mayor.	7	A.	Yeah.
8	Q.	Well, we talked about mayor, we talked about	8	Q.	And she's been a clerk continuously since
9		and you have retirement from the	9	then?	
10	superinte	endent's position; is that right?	10	A.	Yes.
11	A.	School district.	11	Q.	Do you have an assistant?
12	Q.	School district.	12	A.	Yes.
13	A.	Yes.	13	Q.	And who is that?
14	Q.	Any sources of income other than that?	14	A.	Drenia Lewis.
15	A.	No.	15	Q.	And who is Drenia Lewis; is she related to
16	Q.	Other than what you already testified to, have	16	you?	
17	you had o	ther jobs since you were elected mayor in 2003?	17	A.	Yes.
18	A.	Not that I recall.	18	Q.	Is she your sister?
19	Q.	Harvey has a city clerk, correct?	19	A.	Yes.
20	A.	Correct.	20	Q.	And is was she appointed to that position?
21	Q.	Who is that?	21	Α.	By me?
22	A.	Nancy Clark.	22	Q.	By anybody.
23	Q.	Is that an elected position?	23	A.	Yes.
24	Α.	Yes.	24	Q.	Okay. Was it by you?
_			-	<b>F</b> .	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4

Page 36	Eric	Kellogg - 0	7/31/2014		Pages 3437
2 A. Since 2003. A. S		-	200 C 100 C	1	
3 A. Since 2003. 4 Q. And does she have a full-time position? 5 A. Yes. 5 Q. And what are Ms. Lewis' duties? 7 A. She works with the department heads, works 8 with the residents of the City of Earwey. She fills 9 various complaints. She holds department head meetings 20 and what sort of hings. 10 Q. Has Ms. Lewis ever done political work for 11 you? 12 A. Yes. 13 A. Yes. 14 Q. And what sort of political work has she done 15 for you? 16 A. Named my campaign office. 17 Q. Has Ms. Lewis ever done political work has she done 18 for you? 19 A. Named my campaign office. 10 Page 30 11 Tablieve you said you first ran for mayor in 19 1999, correct? 10 A. Yes. 11 today? 12 A. Yes. 13 A. Correct. 14 Q. And did you have a campaign office then? 15 A. Yes. 16 Q. May. Do you know what year she graduated 17 from law school? 18 don't - again, I'm - I'm not sure, but she was a full 19 fleighad attormey graduated of Northeeterm - I'm sorry, 19 (A. Was). 10 (All you have a campaign office then? 11 today? 12 A. Yes. 13 A. So she was qualified. 14 Q. I understand. 15 A. Yes and the laiver you said you estimated or you 16 A. No. 17 the you always had the same campaign office then? 18 A. Yes. 19 Q. And did you have a campaign office then? 20 Q. And did you have a campaign office then? 21 today? 22 A. No. 23 Q. Okay. Do you have a golf outing 24 A. Yes. 24 Q. and do you have a golf outing 25 A. Yes. 26 Q. Say Do you have a golf outing 26 A. See works with the golf outing in terms of overreeing the entire golf operations. There's a committee that's associated with that. 24 Q. Do you know whether Ms. Lewis has ever made a political event for you? 25 A. See works with the golf outing in terms of overreeing the entire golf operations. There's a committee that's associated with that. 26 Q. Do you know whether Ms. Lewis has ever made a political event for you? 27 A. The mot sure. 28 Q. Do you know whether Ms. Lewis has sever run for office hersel? 29 A. Not that I know of. 30 Q. Who is the city attorney in Harvey? 31 A. Not that				55	STATE OF THE STATE
4 appointed her?  5 A. Yes. 6 Q. And what are Me. Lewis' duties? 7 A. She works with the department heads, works with the residents of the City of Harvey. She fills with the residents of the City of Harvey. She fills with the residents of the City of Harvey. She fills with the residents of the City of Harvey. She fills of mot and just a plethora of things. 10 and just a plethora of things. 11 Q. Bas Me. Lewis ever done political work for 12 you? 12 you? 13 A. Yes. 14 Q. And what sort of political work has she done for you? 15 A. Named my campaign office. 16 A. Named my campaign office. 17 Q. Have you always had the same campaign office since your. Strike that. 19 I Toblieve you said you first ran for mayor in 1999, correct? 20 Q. And did you have a campaign office then? 21 A. Correct. 22 Q. And did you have a campaign office then? 23 A. Yes. 24 Q. And do you have a compaign office then? 25 Q each year? 26 A. No. 27 Q. Lews you whave a golf outing A. Yes. 28 Q each year? 29 Q each year? 20 Q. And does Me. Lewis run the golf outing? 20 Q. Ley Co you know whether Me. Lewis has ever made a political event for you? 21 A. Te's a political event. 22 Q. Do you know whether Me. Lewis has ever made a political event for you? 23 A. Yes. 24 Q. Do you know whether Me. Lewis has ever made a political event for you? 25 A. Te's a political event. 26 Q. Do you know whether Me. Lewis has ever made a political event for you? 27 A. No. 38 De you know whether Me. Lewis has ever made a political event for you? 39 Q. Do you know whether Me. Lewis has ever made a political event for you? 30 Q. Do you know whether Me. Lewis has ever made a political event for you? 31 A. Te's a political event. 32 Q. Do you know whether Me. Lewis has ever made a political event for you? 31 A. Not that I know of. 32 Q. Do you know whether Me. Lewis has ever made a political event for you? 32 A. No. 33 A. Not that I know of. 34 A. Not that I know of. 35 A. Not that I know of. 36 A. Not that I know of. 37 A. Not that I know of. 38 A. Not tha	0.00	70	ANALYSIS WAS BEEN ANALYSIS - CONTROL SERVICE WAS SERVED WAS ALVER AN ALVER AND		
5 A. Yes. 6 Q. And what are Ms. Lewis' duties? 7 A. She works with the department heads, works 8 visit the residents of the City of Barvey. She fills 9 various complaints. She holds department head meetings 10 and just a plethora of things. 11 Q. Bas Ms. Lewis ever done political work for 12 you? 13 A. Yes. 14 Q. And what sort of political work has she done 15 for you? 16 A. Manned my campaign office. 17 Q. Bave you always had the same campaign office 18 since you Strike that. 19 I believe you said you first ran for mayor in 1999, correct? 21 A. Correct. 22 Q. And did you have a campaign office then? 23 A. Yes. 24 Q. And do you have the same campaign office 1 today? 2 A. No. 3 Q. Okay. Do you have a golf cuting 4 A. Yes. 6 A. No. 6 Overseaing the entire golf operations. There's a conmittee that's associated with that. 9 Q. Do you know whether Ms. Lewis has ever made a political event for you? 1 A. Yes a political event for you? 2 A. The mot sure. 3 Q. Do you know whether Ms. Lewis has ever made a political event for you? 3 A. No. Law is run the golf outing? 4 A. If mot sure. 4 Pin not sure. 5 Q. Do you know whether Ms. Lewis has ever made a political event for you? 5 A. I'm not sure. 6 Q. Do you know whether Ms. Lewis has ever made a political event for you? 7 A. She was an attorney - for the question and stream for you? 8 A. Yes. 9 Committee that's associated with that. 9 Q. Do you know whether Ms. Lewis has ever made a political event for you? 18 A. I'm not sure. 9 Q. Do you know whether Ms. Lewis has ever made a political event for you? 19 A. Pin not sure. 9 Q. Do you know whether Ms. Lewis has ever made a political event for you? 19 A. Pin not sure. 9 Q. Do you know whether Ms. Lewis has ever made a political event for you? 19 A. Pin not sure. 9 Q. And did you appoint her as city attorney? 10 A. Bettie Lewis. 11 D. Yes and did you appoint her as city attorney? 12 A. Yes. 13 A. Not that I know of. 14 C. I don't know the exact year. Maybe adout. 15 footyou? 16 Controlled the cutting a Harvey event or is					
6 Q. Okay. Do you know what year she graduated 7 A. She works with the department heads, works 8 with the residences of the City of Harvey. She fills 9 various complaints. She holds department head meetings and just a plethors of things. 10 Q. Bas Ms. Lewis ever done political work for 12 you? 13 A. Yes. 14 Q. And what sort of political work has she done 15 for you? 16 A. Manned my campaign office. 17 Q. Have you always had the same campaign office 8 since you Strike that. 19 I believe you said you first ran for mayor in 10 1999, correct? 11 A. Correct. 12 Q. And did you have a campaign office then? 12 A. Yes. 13 A. Yes. 14 Q. And don't get me wrong, I'm not I'm not 15 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 16 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 17 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 18 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 19 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 19 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 19 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 19 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 19 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 19 don't again, I'm I'm not sure, but she was a full fledged attorney graduate of Northmestem I'm sorry, 10 don't again, I'm I'm not sure, but she was a full fledged attorney and I'm sorry and I'm s	2000	767000 1900	Secretaristic Material Secretaristic Materials (Material Material) (Material)		
7 A. She works with the department heads, works 8 with the residents of the City of Harvey. She fills 9 various complaints. She holds department head neetings 10 and just a plethora of things. 10 Q. Has Ms. Lewis ever done political work for 12 you? 13 A. Yes. 14 Q. And what sort of political work has she done 15 for you? 16 A. Manned my campaign office. 17 Q. Have you always had the same campaign office 18 since you Strike that. 19 I believe you said you first ran for mayor in 1999, correct? 21 A. Correct. 22 Q. And did you have a campaign office then? 23 A. Yes. 24 Q. And do you have the same campaign office 25 A. Yes. 26 Q. And do you have a campaign office then? 27 A. Yes. 28 Q. And do you have a golf outing 29 A. Yes. 29 Q. Okay. Do you have a golf outing 20 Q. Okay. Do you know if she had any prior working experience as an attorney before you appointed her city attorney? 29 A. Yes. 20 Q. Okay. Do you know shether Ms. Lewis has ever made a political event for you? 20 A. I'm not sure. 21 A. I'm so ture. 22 A. I'm so ture. 23 A. Yes. 24 C. Orrect. 25 A. Yes. 26 D. Oyou know whether Ms. Lewis has ever made a political contribution to your campaigns? 29 A. I'm not sure. 20 Q. No you know whether Ms. Lewis has ever made a political contribution to your campaigns? 20 A. I'm not sure. 21 A. Orrect. 22 A. I'm not sure. 23 A. Yes. 24 C. Orrect. 25 A. I'm not sure. 26 D. Oyou know whether Ms. Lewis has ever made a political contribution to your campaigns? 27 A. I'm not sure. 28 A. I'm not sure. 29 Perspective. 20 Prow what prospective? 20 Prow what prospective? 21 A. I'm sure that you receive a wealth of experience as an attorney, so based on that and office that the political event. 29 Prime with the golf outing in terms of experience as an attorney, so based on that and political contribution to your campaigns? 20 Prow what prospective relative to the city attorneys appoint her as city attorney? 21 A. No. that I know of. 22 A. I'm not sure. 23 A. I'm sure that you receive a wealth of experience an attorne	100			1857	
with the residents of the City of Harvey. She fills various complaints. She holds department head meetings and just a plethors of things.  Q. Has Ms. Lewis ever done political work for you?  A. Yes.  Q. And what sort of political work has she done for you?  A. Manned my campaign office. Q. Have you always had the same campaign office since you "Strike that.  The hister you said you first ran for mayor in Jessince you "Strike that.  A. Correct.  Q. And did you have a campaign office then?  A. Yes.  A. Yes.  Q. And do you have the same campaign office A. No.  Q. And do you have a campaign office then?  A. Yes.  Q. And do you have a golf outing  A. Yes.  Q. Test he works with the golf outing?  A. She works with the golf outing in terms of coverseing the entire golf operations. There's a committee that's associated with that.  Q. Is the golf outing a Harvey event or is that a political event for you?  A. I'm not sure.  Q. Pron what prospective?  A. I'm not sure.  J. Correct.  A. Yes.  A. Wes.  A. No.  A. Yes.  A. No.  A. Ten't know the exact year. Maybe 2002, I don't sgain, I'm I'm not sure, but she was a full flowed addomed and Northern taw School.  Q. Okay. And she  A. So she was qualified.  Q. I understand.  And I believe you said you estimated or you thought perhaps she graduated from law school in 2002?  A. She was an attorney  A. She was an attorney  A. Wes.  Q. And do you have a campaign office then?  A. Yes.  Q. And do you have a campaign office then?  A. Yes.  Q. And do you have a sampaign office then?  A. Yes.  Q. And do you have a golf outing  A. Yes.  Q. And does  A. Yes.  Q. Do you know if she had any prior working experience as an attorney before you appointed her city attorney?  A. Wes. Stiffly to that.  BY THE WINESSE.  A. Well, I can only speak from a knowle		-			
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24 Q. And do you have the same campaign office  Page 35  1 today?  A. No.  Q. Okay. Do you have a golf outing  A. Yes.  Q each year?  A. She works with the golf outing in terms of overseeing the entire golf operations. There's a committee that's associated with that.  Q. Is the golf outing a Harvey event or is that a political event for you?  A. It's a political event.  Q. Do you know if she had any prior working experience as an attorney before you appointed her city attorney?  A. She works with the golf outing?  A. She works with the golf outing in terms of overseeing the entire golf operations. There's a committee that's associated with that.  Q. Is the golf outing a Harvey event or is that a political event for you?  A. It's a political event.  Q. Do you know whether Ms. Lewis has ever made a political contribution to your campaigns?  A. I'm not sure.  Q. Do you know whether Ms. Lewis has ever run for office herself?  A. Not that I know of.  Q. Who is the city attorney in Harvey?  A. Bettie Lewis.  Q. And did you appoint her as city attorney?  24 when she was hired.  Q. Do you know if she had any prior working experience as an attorney before you appointed her city attorney?  A. No.  A. Yes.  Q. Do you know appoint her as city attorney?  A. Well, I can only speak from a knowledge prespective.  Q. From what prospective?  A. Oh, from a very knowledge prospective relative to the the very grueling process that you attorneys go through. I'm sure that you receive a wealth of experience during your educational, you know, curriculum so I'm sure that you've probably seen all forms of political I'm sorry, legal aspect in in your aspiration to become an attorney, so based on that and her qualifications and the fact that she passed the bar to be a full fledged attorney, you based on that, and her qualifications or experience as an attorney. So based on that, and her qualifications or experience as an attorney. So based on relevance, but if you know appoint her as city attorney?  12 A. Oh, from a very kn	22	Q.	And did you have a campaign office then?	22	
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22 A. Yes.  22 I'm sure that she's well equipped to handle the nuances 23 Q. And did you appoint her as city attorney?  23 of her position.	15.32			40.5735	75 2-90 Barn (N-904 4-00) STAT AR 800 STAT AR 800 STATE (N-905 AV TE N-905 AV
23 Q. And did you appoint her as city attorney? 23 of her position.	35333-1	550	And is Ms. Lewis your niece?		
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24 A. Yes. 24 Q. Do you know what her qualifications were other		55		9 8	
	24	Α.	res.	24	Q. Do you know what her qualifications were other



Pages 38..41

Page 38 Page 40 than having passed the bar exam? 1 terms of her affiliation with the -- with the firm that 2 MR. SMITH: Object to the form of the question. 2 she's currently with, I can't address that. 3 BY MR. WALSH: 3 Okay. You don't ever speak to her about that? 4 Well, let me ask you this, do you know if she 4 A. No, I don't. 5 had any prior working experience before you appointed 5 Has she ever done political work for you? 0. 6 her city attorney? 6 I'm trying to --A. MR. SMITH: Object to the form of the question. 7 7 MR. SMITH: I'll object to the form of the 8 Working as a lawyer --8 question. 9 MR. WALSH: Yes, working as a lawyer. 9 What exactly do you mean by political work? 10 MR. SMITH: -- not working as a lawyer? 10 MR. WALSH: Anything to further the mayor's 11 BY MR. WALSH: 11 political goals, campaigns, fundraising, anything. 12 Working as a lawyer. 12 BY THE WITNESS: Prior to becoming a lawyer she couldn't have 13 13 A. Again, she's attended some of my fundraisers. worked as a lawyer. I mean, I just know that she was a 14 14 Q. She has? 15 qualified individual who passed the bar and was -- you 15 The golf outing I'm sure. 16 know, has been doing a tremendous job for the city. Okay. Does she help run the golf outing? 16 0. 17 Okay. And I don't mean to harp on it, but I 17 A. She was probably on the committee. 18 just want to make sure we're clear, do you know whether 18 0. Okay. And that's a political fundraising 19 she had any work experience as an attorney before you 19 event, correct? 20 appointed her as city attorney? 20 A. Yes 21 I can only -- I can only speak on the fact 21 Okay. Do you know if she's ever collected 0. 22 that she was a very competent, qualified, integral part 22 signatures for you? 23 of my establishment. 23 A. I'm not sure. 24 Did she give you a resumé? 24 Do you know any other political work that Page 39 Page 41 Again, I can only speak to the fact that she 1 she's done for you other than the golf outing? 2 was competent and she's qualified and at the time -- you 2 A. I'm not sure. 3 know, she was quantified and qualified as an attorney. 3 0. Do you know if she's ever made a donation to And do you know whether she gave you a resumé? 4 4 your campaign? 5 2003 -- I'm sure she probably presented a 5 A. I'm not sure. portfolio, but, again, I can't recall if it was a 6 6 0. How many department heads are there in Harvey? 7 portfolio or if it was a resumé, I can't recall. 7 A. There's the police, the fire --8 Okay. Does Ms. Lewis have an office at City Q. Uh-huh. 9 Hall currently? 9 A. -- the street department and the water 10 A. Yes. 10 department, which is combined. 11 0. And does she work full-time for Harvey? 11 Q. Streets and water are combined? 12 A She's our corporate counsel. 12 A. Yeah, they're combined. 13 Q. Is that a full-time position? 13 Okay. Q. 14 Yes, it is. A. 14 A. And then we have the planning department. 15 0. Okay. And does that position pay \$170,000? 15 Q. Anyone else? 16 A. Somewhere in that area. 16 A. That's -- that's it. 17 Okay. And she also works for the firm that's 17 0. How about the comptroller, is that a 18 representing you in this case, correct? 18 department head? 19 A. Yes, sir. 19 I wouldn't necessarily say it's a department Okay. Do you know whether she works full-time 20 0. 20 head, but the comptroller, you know, serves as -- you 21 for that firm also? know, comptroller for the city and handles all the 21 22 Well, let -- let me just say in terms of her 22 business matters of the city. 23 full and part-time association with -- you know, her 23 Let me show you what I'm going to mark as firm -- all I know is that she's corporate counsel, in

Kellogg 4.

Pages 42..45

	D10		
1	Page 42 (Kellogg Deposition Exhibit No. 4	1	BY THE WITNESS:
2	marked as requested.)	2	A. Yeah, he was the comptroller.
3	BY THE WITNESS:	3	Q. The question is
4	A. Like I said, he's a comptroller.	4	A. Which is consistent with the document.
5	Q. Do you recognize Exhibit 4?	5	Q. Is the comptroller a department head?
6	A. Yes, I do.	6	A. It's a it can be considered a separate
7	Q. And is this a memorandum created by you or for	7	department.
8	you?	8	Q. And then is the comptroller a department head?
9	A. Yes.	9	A. Based on this document, I would say that he's
10	Q. Okay. And which do you know if you	10	the head of his particular department.
11	actually created this memorandum or if someone did it	11	Q. Okay. And would you consider that a
12	for you?	12	department head?
13	A. I can't recall.	13	A. I would consider him the head of that
14	Q. Is it your policy and practice to type your	14	department of the finance department.
15	own memorandums or do you have someone do that for you?	15	Q. Okay. And as mayor, do you appoint the
16	A. Generally someone else, uh-huh.	16	department heads?
17	Q. This says this quotes a I'm very sorry.	17	A. Yes
18	This quotes a section of the municipal code	18	Q. And
19	about the comptroller position, correct?	19	A with the consent of the council.
20	A. Yes.	20	MS. COURT REPORTER: With the what?
21	Q. Okay. And it says there is created is	21	THE WITNESS: Consent of the council.
22	that now, the municipal code, is that the Illinois	22	BY MR. WALSH:
23	Municipal Code?	23	Q. Do all the department head appointments
24	A. Yes.	24	require consent of the council?
-	Page 43		Page 45
1	Q. Okay. And it says there is created the office	1	A. I believe so, yes.
2	of the city comptroller who shall be the head of the	2	Q. Your police chief is Denard Eaves, correct?
3	department of finance.	3	A. Yes.
4	A. Okay.	4	Q. And he's acting chief, correct?
5	Q. Is that correct that's correct?	5	A. Correct.
6	A. Yes.	6	Q. And he's been acting chief since 2007?
7	Q. Okay. So would that mean that he is a	7	A. Yes.
8	department head?	8	Q. Did you were you required to get consent of
9	A. I said he was a comptroller, yes, I did. I	9	the council even though he was just acting chief or does
10	stated that in my testimony.	10	that allow you to appoint him without getting consent
11	Q. He is a department head, the comptroller?	11	from the council?
12	A. Again, based on this document, the comptroller	12	A. If he was ever brought to the city council for
14	who was considered management and in control of all the financial matters.	13	confirmation, then he would be he would get the
15		14	consent of council.
16	Q. And how about a department head, yes or no?	15	Q. But because he's acting chief, are you not
	MR. SMITH: I'm going to object to the form of the	16	required to get the consent of the council?
17	question.	17	A. It's my understanding that he's going to be
18	BY THE WITNESS:	18	brought to the council as the permanent chief, then he
19	A. He's the comptroller.	19	would then there would be a need for a consent.
20	MR. SMITH: The document speaks for itself.	20	Q. Okay. Has Denard Eaves ever performed
21	MR. WALSH: Okay. Well, I don't think that's an	21	political work for you?
22	objection. I'm asking him whether the comptroller is a	22	MR. SMITH: Again, I'm going to object to the form
23	department head.	23	of the question as to what political work means.
24		24	MR. WALSH: Okay.
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	Page 46		Page 48
1	MR. SMITH: If you understand the question	1	A. I can't due to his religion, I don't I
2	THE WITNESS: Right.	2	can't recall. It's a shame, but I can't recall.
3	MR. SMITH: you can answer.	3	Q. Who is the head of streets and water?
4	BY THE WITNESS:	4	A. Superintendent Rufus Fisher.
5	A. I'm sure that if he's he probably	5	Q. And how long has Mr. Fisher been the
6	participated in some fundraising activities.	6	department head of streets and water?
7	Q. Okay. How about collecting signatures?	7	A. 2003.
8	A. I'm not sure.	8	Q. Are you related to Rufus Fisher?
9	Q. How about going door to door?	9	A. No, sir.
10	A. He might have, I'm not I can't recall.	10	Q. And has Rufus Fisher ever done political work
11	Q. Have you ever asked him if he's done political	11	for you?
12	work for you?	12	A. Yes, sir.
13	A. I don't recall ever having a conversation.	13	Q. Okay. And what sort of work has he done?
14	Q. You ever see him at your campaign office?	14	A. Probably passing out fliers or something.
15	A. Yes.	15	Q. Do you know whether Mr. Fisher has ever made a
16	Q. Okay. And during election season?	16	political contribution to you?
17	A. Yes.	17	A. I'm not sure.
18	Q. Okay. And in what years?	18	Q. Have you ever seen him at your campaign
19	A. I don't recall the exact years, but I have saw	19	office?
20	him seen him at my campaign office.	20	A. Yes, sir.
21	Q. And has Denard Eaves ever made a political	21	Q. In what years?
22	contribution to you?	22	A. I can't recall the exact years.
23	A. I'm not sure.	23	Q. And who's the head of planning?
24	Q. Who is the fire chief?	24	A. LaTanya Rufus.
	Page 47		Page 49
1	A. Jason Bell.	1	Q. And how long has Ms. Rufus been the head of
2	Q. BELL?	2	planning or planning, yes.
3	A. Yes.	3	A. I believe she came in maybe 2004, 2005. I'm
4	Q. Bell.	4	not exactly sure of the year that she came in and then
5	And how long has Chief Bell been your fire	5	she took she left and took another job and there was
6	chief?	6	a break in service.
7	A. Probably four, five years.	7	Q. Sorry.
8	Q. And has Chief Bell ever done political work	8	A. But I believe maybe 2005, somewhere in that
9	for you?	9	area.
10	MR. SMITH: Same objection to the form of the	10	Q. Okay. Are you related to Ms. Rufus?
11	question as the terms political work are not defined.	11	A. No, sir.
12	If you understand the question, you can	12	Q. How did you meet her?
13	answer.	13	A. I don't recall how we met.
14	THE WITNESS: Right.	14	Q. Has Ms. Rufus ever done political work for
15	BY THE WITNESS:	15	you?
16	A. I'm not sure in terms of there's	16	MR. SMITH: Same objection.
17	religious I think he's a Jehovah's witness so I	17	BY THE WITNESS:
18	don't I can't recall if you know, due to the fact	18	A. She more than likely yeah, she's probably
19	that it was religion I know he's a Jehovah's witness	19	done some political work.
20	and his family so I don't know if, in fact, he was	20	Q. Okay. In what in what form?
21	involved in any political work. I can't recall any	21	A. I'm not sure exactly what form, but maybe
22	political work.	22	attending the golf outing or things of that nature.
23	Q. Have you ever seen him at your campaign	23	Q. Do you know if she's ever made a campaign
		0.4	James Library December 1
24	office?	24	donation to you?

1	Page 50	T	
1	A. I'm not sure, but it's all public public	1	he ever make a campaign contribution to you before you
2	record.	2	appointed him as comptroller?
3	Q. Have you ever seen her at your campaign	3	MR. SMITH: I'm going to object to the form of the
4	office?	4	question.
5	A. I believe so.	5	If you know.
6	Q. I'm sorry?	6	MR. WALSH: Every question is if he knows. I mean,
7	A. I believe so.	7	I kind of think that's coaching in a way, right? That's
8	Q. In what years?	8	not an objection.
9	A. I'm not sure of the years.	9	MR. SMITH: I'm not coaching.
10	Q. And how about but do you have any relatives	10	MR. WALSH: Then what was the point of saying if
11	that work for Harvey? I'm sorry, other than what you	11	you know. Every single question here is if you know.
12	testified to. I believe you said Drenia Lewis is your	12	MR. SMITH: Well, you're asking him if somebody
13	sister, Bettie Lewis is your niece.	13	who's a party to this case made a campaign donation.
14	A. Uh-huh.	14	MR. WALSH: Yeah.
15	Q. Do you have any other relatives that work at	15	MR. SMITH: In order for him to know that,
16	Harvey?	16	respective to Letke and the other individual, he would
17	A. Derrick Muhammad.	17	actually have to see them making a donation.
18	Q. Okay. And he's your brother?	18	MR. WALSH: Or just say I don't know.
19	A. Yes.	19	MR. SMITH: Well
20	Q. Any others?	20	MR. WALSH: He can say I know or I don't know.
21	A. Not that I can think of at this point. Not	21	MR. SMITH: Well, what he can say is
22	that I can recall at this point. Let me see.	22	BY THE WITNESS:
23	Okay. Go ahead.	23	A. I said it was all public record.
24	Q. What was your answer?	24	MR. SMITH: It's all public record.
	Page 51		Page 53
1	A. At this point I can't recall any I mean,	1	MR. WALSH: I understand that, but I want to know
2	I'm trying to think.	2	if he knows.
3	I'll come back to that, let me just	3	MR. SMITH: Well, the issue is the issue here is
4	Q. Okay.	4	is we're not going to give testimony that's contrary to
5	A. I got to peruse the different departments, you	5	public record, so that's off the table if that's what
6	know.	6	you're looking for.
7	Q. That's fine.	7	MR. WALSH: I'm looking to just
8	A. Okay.	8	MR. SMITH: We're not going to
9	Q. Okay. And then Joseph Letke, he was the	9	MR. WALSH: I'm looking for what he knows. I'm not
10	comptroller, correct?	10	looking for contrary, I'm not looking for consistent
11	A. Correct.	11	with, I'm just looking for what your client knows about
12	Q. And in what year was he Strike that.	12	whether Joseph Letke made campaign contributions before
13	Did you appoint him comptroller?	13	he was appointed comptroller.
		14	MR. SMITH: Yeah, any any questions related to
14	A. I believe I appointed him with the council's		1
15	approval.	15	political contributions are public record.
15 <b>16</b>	approval. Q. Okay. In what year?	15 16	political contributions are public record.  MR. WALSH: I understand that.
15 <b>16</b> 17	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly	15 16 17	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list
15 16 17 18	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly sure what I believe it was 2008, yeah.	15 16 17 18	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list with checks and balances who gave him contributions, the
15 16 17 18 19	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly sure what I believe it was 2008, yeah.  Q. And did Joseph Letke ever make campaign	15 16 17 18 19	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list with checks and balances who gave him contributions, the only thing that he can tell you is that any political
15 16 17 18 19 20	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly sure what I believe it was 2008, yeah.  Q. And did Joseph Letke ever make campaign contributions to you before you appointed him	15 16 17 18 19 20	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list with checks and balances who gave him contributions, the only thing that he can tell you is that any political contributions are in the records of the State Board of
15 16 17 18 19 20 21	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly sure what I believe it was 2008, yeah.  Q. And did Joseph Letke ever make campaign contributions to you before you appointed him comp	15 16 17 18 19 20 21	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list with checks and balances who gave him contributions, the only thing that he can tell you is that any political contributions are in the records of the State Board of Elections.
15 16 17 18 19 20 21 22	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly sure what I believe it was 2008, yeah.  Q. And did Joseph Letke ever make campaign contributions to you before you appointed him comptroller?  A. No, any campaign donations that Mr. Letke	15 16 17 18 19 20 21 22	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list with checks and balances who gave him contributions, the only thing that he can tell you is that any political contributions are in the records of the State Board of Elections.  MR. WALSH: That's not the only thing he can tell
15 16 17 18 19 20 21	approval.  Q. Okay. In what year?  A. Maybe 2008, '07 or something. I'm not exactly sure what I believe it was 2008, yeah.  Q. And did Joseph Letke ever make campaign contributions to you before you appointed him comp	15 16 17 18 19 20 21	political contributions are public record.  MR. WALSH: I understand that.  MR. SMITH: And if the mayor doesn't have a list with checks and balances who gave him contributions, the only thing that he can tell you is that any political contributions are in the records of the State Board of Elections.

Pages 54..57

	Page 54	T	Page 56
1	of Illinois, I can say go look in the dictionary. It's	1	Q. Did you have any business or did you do any
2	in the dictionary, right, but I know that Chicago is in	2	business with Joseph Letke between 2004 and 2008?
3	the State of Illinois, so what I trying to do is test	3	A. Didn't.
4	his knowledge, not have him direct me to a public	4	Q. Did he do any work for Harvey that you know of
5	record.	5	between 2004 and 2008?
6	MR. SMITH: Right.	6	A. I'm not I'm not sure.
7	MR. WALSH: Fair enough.	7	Q. Did you have any business relationship with
8	BY THE WITNESS:	8	Joseph Letke between 2004 and 2008?
9	A. I can only tell you that anyone who makes	9	A. Business relationship, what what do you
10	contributions to my campaign office is matter of public	10	mean?
11	record. I don't know. That's all.	11	Q. In any private business, in public sector, any
12	Q. Do you know whether Joseph Letke was your	12	business relationship.
13	largest campaign contributor before you appointed him as	13	A. There was no business relationship.
14	comptroller?	14	Q. Did you know Joseph Letke between 2004 and
15	A. I'm I'm not sure.	15	2008?
16	Q. I'll show you what I'll mark as Kellogg 5.	16	A. I believe so.
17	(Kellogg Deposition Exhibit No. 5	17	
	(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)		20-0-10 20-0-10 20 PORTO PERSON ST 31-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0
18	marked as requested.)	18	
19	MR. SMITH: Thank you.	19	Q. Did you ever socialize with Joseph Letke
20	BY MR. WALSH:	20	between 2004 and 2008?
21	Q. Do you recognize Exhibit No. 5?	21	MR. SMITH: Object to the form of that question,
22	A. Yes, I do.	22	socialize.
23	Q. And what do you recognize it to be?	23	How are we defining socialize?
24	A. It's a document which indicates various donors	24	
	Page 55	12	Page 57
1	Page 55 to my campaign.	1	BY MR. WALSH:
1 2	to my campaign.	F 400	BY MR. WALSH:
2	to my campaign. Q. Actually, it shows donations.	1 2	BY MR. WALSH: Q. You ever go to dinner, go to lunch, play golf?
<b>2</b> 3	to my campaign.  Q. Actually, it shows donations.  A. Right.	1 2 3	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know,
2 3 4	to my campaign.  Q. Actually, it shows donations.  A. Right.  Q. The donations that Joseph Letke made.	1 2 3 4	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.
2 3 4 5	Q. Actually, it shows donations. A. Right. Q. The donations that Joseph Letke made. A. Oh, these are okay.	1 2 3 4 5	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with
2 3 4 5 6	to my campaign.  Q. Actually, it shows donations.  A. Right.  Q. The donations that Joseph Letke made.  A. Oh, these are okay.  Q. And on Page 2 at the bottom, in 2004 there was	1 2 3 4 5 6	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with Joseph Letke between 2004 and 2008?
2 3 4 5 6 7	to my campaign.  Q. Actually, it shows donations.  A. Right.  Q. The donations that Joseph Letke made.  A. Oh, these are okay.  Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom	1 2 3 4 5 6 7	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.
2 3 4 5 6 7 8	to my campaign.  Q. Actually, it shows donations.  A. Right.  Q. The donations that Joseph Letke made.  A. Oh, these are okay.  Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom of Page 2.	1 2 3 4 5 6 7 8	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.  Q. Do you know if Joseph Letke did any political
2 3 4 5 6 7 8	to my campaign.  Q. Actually, it shows donations.  A. Right.  Q. The donations that Joseph Letke made.  A. Oh, these are okay.  Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom of Page 2.  A. Yes.	1 2 3 4 5 6 7 8	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.  Q. Do you know if Joseph Letke did any political work for you between 2004 and 2008?
2 3 4 5 6 7 8 9	to my campaign.  Q. Actually, it shows donations.  A. Right. Q. The donations that Joseph Letke made.  A. Oh, these are okay. Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom of Page 2.  A. Yes. Q. Okay. Were you running for office in 2004?	1 2 3 4 5 6 7 8	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.  Q. Do you know if Joseph Letke did any political
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2 3 4 5 6 7 8 9	to my campaign.  Q. Actually, it shows donations.  A. Right. Q. The donations that Joseph Letke made.  A. Oh, these are okay. Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom of Page 2.  A. Yes. Q. Okay. Were you running for office in 2004?	1 2 3 4 5 6 7 8 9	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.  Q. Do you know if Joseph Letke did any political work for you between 2004 and 2008?  A. I can't recall.
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2 3 4 5 6 7 8 9 10 11 12	Q. Actually, it shows donations. A. Right. Q. The donations that Joseph Letke made. A. Oh, these are okay. Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom of Page 2. A. Yes. Q. Okay. Were you running for office in 2004? A. I think you know, campaign I mean, do you have to be running for office for individuals to donate?	1 2 3 4 5 6 7 8 9 10 11 12 13	BY MR. WALSH:  Q. You ever go to dimmer, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.  Q. Do you know if Joseph Letke did any political work for you between 2004 and 2008?  A. I can't recall.  MR. SMITH: Same objection.  BY MR. WALSH:  Q. What's that?
2 3 4 5 6 7 8 9 10 11 12 13 14	to my campaign.  Q. Actually, it shows donations.  A. Right.  Q. The donations that Joseph Letke made.  A. Oh, these are okay.  Q. And on Page 2 at the bottom, in 2004 there was a contribution made of \$5,000; do you see that? Bottom of Page 2.  A. Yes.  Q. Okay. Were you running for office in 2004?  A. I think you know, campaign I mean, do you have to be running for office for individuals to donate?  Q. I don't know that.	1 2 3 4 5 6 7 8 9 10 11 12 13 14	BY MR. WALSH:  Q. You ever go to dinner, go to lunch, play golf?  A. No, I can't recall that particular, you know, association.  Q. Did you ever speak on the phone with  Joseph Letke between 2004 and 2008?  A. I can't recall if I did.  Q. Do you know if Joseph Letke did any political work for you between 2004 and 2008?  A. I can't recall.  MR. SMITH: Same objection.  BY MR. WALSH:  Q. What's that?  A. No, I can't recall.
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